

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re

Chapter 11

LEHMAN BROTHERS HOLDINGS INC. *et al.*,

Case No. 08-13555 (JMP)
(Jointly Consolidated)

Debtors.

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**NOTICE OF INTENT TO PARTICIPATE IN
DISCOVERY RELATED TO PLAN CONFIRMATION**

NOTICE IS HEREBY GIVEN that Retirement Housing Foundation and its affiliates, Foundation Property Management, Bixby Knolls Towers, Inc., Gold County Health Center, Inc., Mayflower Gardens Health Facilities, Inc., Mayflower RHF Housing, Inc., Sun City RHF Housing, Holly Hill RHF Housing, Inc., Merritt Island RHF Housing, Inc., Martin Luther Foundation, Inc., Yellowwood Acres, Inc., Bluegrass RHF Housing, Inc., St. Catherine RHF Housing, Inc. and DeSmet RHF Housing, Inc. (collectively as "RHF"), by their attorneys, Klestadt & Winters, LLP, have filed claim numbers 10493 and 10496 against Lehman Brothers Holdings Inc. ("LBHI") in the amounts of \$5,233,852 and \$11,871,612, respectively, and claim numbers 10494 and 10495 against Lehman Brothers Special Financing Inc. ("LBSF") in the amounts of \$5,233,852 and \$11,871,612, respectively, and/or is a party in interest in the confirmation of a plan in the above captioned chapter 11 cases (the "Chapter 11 Cases").

ACCORDINGLY, PLEASE TAKE FUTHER NOTICE that, subject to any objections by the Debtors or Statutory Committee of Unsecured Creditors appointed in the Chapter 11 Cases and/or any limitations imposed by the Court, the above named party in interest and its counsel intends to participate as follows in the Plan Discovery, as defined in the Order Establishing Procedures in Connection with Discovery Related to Plan Confirmation and Other Issues entered by the Court on April 14, 2011 [Docket No. 16003]

Dated: April 28, 2011

/s/ John E. Jureller, Jr.
John E. Jureller, Jr.

Contact Information for Party in Interest:

Retirement Housing Foundation
c/o Robert Amberg, President
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Contact Information for Attorneys for Party In Interest:

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Contact Information for Advisors for Party in Interest:

Not Applicable

Designation of Contact(s) to Receive Any Notice Required Under the Order:

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Group that Participant elects to join (pursuant to Paragraph 3(b) of the Order): Pursuant to Paragraph 3(b) of the Order, RHF elects to join Group 3(b)(v) as the creditors of LBSF.